

**EXHIBIT C**  
**DECLARATION OF RON SEVERAID**

THE UNITED STATES DISTRICT COURT,  
FOR THE DISTRICT OF NEW JERSEY

ASTERO, LLC, a New Jersey limited  
liability company; ANDREA K.  
Tantaros, an individual,

Plaintiffs,

vs.

TALK RADIO NETWORK  
ENTERTAINMENT, INC., an  
Oregon corporation, MARK MASTERS, an  
individual, and DOES 1 through 10,  
inclusive,

Defendants.

Case No.: 1:13-cv-06005-NLH-JS

DECLARATION OF RONALD H. SEVERAID  
IN SUPPORT OF MOTION TO  
VACATE DEFAULT

I, RONALD H. SEVERAID, hereby declare that:

1. I am an adult individual who resides in the Rogue River, Oregon area and has an office within office premises at 225 NE Hillcrest Drive, Grants Pass, Oregon.

2. I am making the factual statements in this declaration from my own knowledge and can testify competently to these facts from my personal knowledge if called upon to do so.

3. I am the Executive Vice President and Secretary of defendant TALK RADIO NETWORK ENTERTAINMENT, INC.

4. I had no idea whatsoever that there had been any claimed service of process in this case until I saw a copy of an application for entry of default sent to the office of TALK RADIO NETWORK ENTERTAINMENT, INC. and immediately began an investigation.

5. No one served me personally with any papers in this action, and, as a result, I have no personal knowledge of any particulars of any such service.

DECLARATION OF RONALD H. SEVERAID IN SUPPORT OF MOTION TO VACATE DEFAULT

1           6.     Erin Terry has no authority whatsoever to accept service of process for TALK RADIO  
2 NETWORK ENTERTAINMENT, INC. The only persons who are authorized to accept service of  
3 process on behalf of TALK RADIO NETWORK ENTERTAINMENT, INC. are myself, in my  
4 capacity as its Executive Vice President and Secretary, and MARK MASTERS, in his capacity of  
5 President and Chief Executive Officer.

6           7.     Erin Terry is not a "BOSS" or a "PERSON IN CHARGE" for TALK RADIO  
7 NETWORK ENTERTAINMENT, INC., or at all within the office premises located at 225 N.E.  
8 Hillcrest Drive, Grants Pass, Oregon.

9           8.     No one advised me that apparent process servers had purportedly served process in  
10 this case prior to the time that I saw and investigated the claims in the request for entry of default,  
11 once I saw that at some point following its mailing. A third party had provided copies of the original  
12 and First Amended Complaint in this action, which were pulled up electronically, together with  
13 copies of orders requiring amendments to them, to me as background information. I do have a  
14 vague recollection of taking a cursory review of the text of the Second Amended Complaint.  
15 However, as I had not been advised that someone had purported to serve that document, it was my  
16 understanding that it was the same as the original complaint, First Amended Complaint and orders I  
17 had previously seen -- a copy pulled up electronically for background information wholly  
18 independent of the plaintiffs. As such, I expected that there would be some form of future service of  
19 process, unless there was another order concerning further amendment of the pleading.  
20

21           9.     TALK RADIO NETWORK ENTERTAINMENT, INC., initially as sole defendant  
22 and then, following the First Amendment, in conjunction with MARK MASTERS, was fully  
23 prepared to move to stay the legal action based upon the mandatory arbitration provision of the  
24 underlying agreement with the plaintiffs, and to advance the considerable disputes with the merits of  
25 the factual and legal claims advanced by the plaintiffs in their complaint in the proper forum  
26  
27  
28

DECLARATION OF RONALD H. SEVERAID IN SUPPORT OF MOTION TO VACATE DEFAULT

1 (arbitration). As I understood it, we were waiting for service to occur in order to do so, and I truly  
2 was surprised to the point of being incredulous that service purportedly had taken place without my  
3 knowledge.

4 I declare under penalty of perjury that the foregoing is true and correct and that this  
5 declaration is created on the 11<sup>th</sup> day of February, 2014, at Rogue River, Oregon.  
6

7  
8  
9  
10   
11 RONALD H. SEVERAID  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DECLARATION OF RONALD H. SEVERAID IN SUPPORT OF MOTION TO VACATE DEFAULT